

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

**WYOMING TECHNOLOGY
LICENSING, LLC,**

Plaintiff,

v.

APPLE INC.

Defendant.

CASE NO. 1:24-cv-347

JURY TRIAL DEMANDED

**JOINT MOTION FOR A 14-DAY STAY OF ALL PENDING DEADLINES
AND NOTICE OF SETTLEMENT**

Plaintiff Wyoming Technology Licensing, LLC and Defendant Apple Inc. (the “Parties”) respectfully notify the Court that the Parties have reached a settlement in principle that resolves all matters in controversy in this case. The parties, however, require additional time to finalize the settlement documents and prepare the Stipulation of Dismissal.

The Parties, therefore, respectfully request that the Court stay all pending motions, actions and deadlines for fourteen (14) days, up to and including July 12, 2024, while the Parties finalize their resolution of this lawsuit, including the submission of a Stipulation of Dismissal. The requested stay is not for delay, but only to allow for an orderly resolution of this lawsuit.

Dated: June 28, 2024

Respectfully submitted,

/s/ Randall Garteiser
Randall Garteiser
Texas Bar No. 24038912
rgarteiser@ghiplaw.com
M. Scott Fuller
Texas Bar No. 24036607

sfuller@ghiplaw.com
GARTEISER HONEA, PLLC
119 W. Ferguson Street
Tyler, Texas 75702
Telephone: (903) 705-7420
Facsimile: (888) 908-4400

Attorneys for Plaintiff

By: /s/ Sarah R. Frazier

Sarah R. Frazier (*pro hac vice*)
Nina Garcia (*pro hac vice*)
Alicia M. Coneys (*pro hac vice*)
Phuc Do (*pro hac vice pending*)
sarah.frazier@wilmerhale.com
nina.garcia@wilmerhale.com
alicia.coneys@wilmerhale.com
phuc.do@wilmerhale.com
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, MA 02109
Telephone: (617) 526-6000
Facsimile: (617) 526-5000

Mark D. Selwyn (*pro hac vice*)
Joseph F. Haag (*pro hac vice*)
mark.selwyn@wilmerhale.com
joseph.haag@wilmerhale.com
WILMER CUTLER PICKERING
HALE AND DORR LLP
2600 El Camino Real, Suite 400
Palo Alto, CA 94306
Telephone: (650) 858-6000
Facsimile: (650) 858-6100

Steven J. Wingard
State Bar No. 00788694
Stephen L. Burbank
State Bar No. 24109672
Robert P. Earle
State Bar No. 241245566
swingard@scottdoug.com
sburbank@scottdoug.com
rearle@scottdoug.com
SCOTT DOUGLASS &
MCCONNICO LLP
303 Colorado Street, Suite 2400
Austin, TX 78701
Telephone: (512) 495-6300

Fax: (512) 495-6399

Attorneys for Defendant Apple Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this, I caused to be electronically-filed the foregoing document with the Clerk of Court using the Court's CM/ECF system. As such, this document was served on all counsel who are deemed to have consented to electronic service.

/s/ Randall Garteiser
Randall Garteiser

CERTIFICATE OF GOOD FAITH CONFERENCE

I hereby certify that the parties have conferred and agreed to jointly request the above extension.

/s/ Randall Garteiser
Randall Garteiser